

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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ANDREA TANTAROS,

Plaintiff,

-- against --

Case No. 17-cv-2958 (GBD)

FOX NEWS NETWORK, LLC, ROGER AILES,
WILLIAM SHINE, IRENA BRIGANTI, PETER
A. SNYDER, DISRUPTOR, INC., and JOHN
DOES 1-50,

NOTICE OF MOTION

Defendants.
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PLEASE TAKE NOTICE that, upon the accompanying Declaration of Judd Burstein, dated September 22, 2017, and upon all prior proceedings heretofore had herein, Judd Burstein and Judd Burstein, P.C. will move this Court, before the Honorable George B. Daniels, United States District Judge, at Courtroom 11A, Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York 10007, at a date and time to be set by the Court, for an Order (a) pursuant to Local Rule 1.4 granting the application of Judd Burstein and Judd Burstein, P.C. to withdraw as counsel for Plaintiff Andrea Tantaros (Ms. Tantaros”) in the above-captioned case, except insofar as allowing Judd Burstein and Judd Burstein, P.C. to defend against the pending motions pursuant to Fed. R. Civ. P. 11(c) asserted against them; and (b) staying this case for 60 days to enable Ms. Tantaros to retain new counsel who can familiarize themselves with the case; together with (c) such other and further relief as this Court deems just and proper.

Dated: New York, New York
September 22, 2017

Respectfully submitted,

JUDD BURSTEIN, P.C.

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TO: All counsel (via ECF)

Andrea Tantaros (via email)